

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION**

TERSHAUD SAVORYEA ROSE,)
)
)
Plaintiff,)
)
v.) **CASE NO. 6:17-cv-00012-NKM**
)
)
CENTRA HEALTH, INC. *et al*,)
)
)
Defendants.)

**SECOND SUPPLEMENTAL DISCLOSURES OF
PLAINTIFF TERSHAUD SAVORYEA ROSE**

Pursuant to Rule 26(e) of the **Federal Rules of Civil Procedure**, Plaintiff Tershaud Savoryea Rose, by and through the undersigned counsel, hereby submits the following Second Supplemental Disclosures to the parties:

1. *The name and, if known, the address and telephone number of each person likely to have discoverable information – along with the subjects of that information – that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.*
 - A) Thomas C. Frazier: **REDACTED** Mr. Frazier is an expert witness who has reviewed the relevant documents and formed the opinion that the LPD and Centra officers acted unlawfully in pursuing, apprehending, detaining, arresting and prosecuting Tershaud Savoryea Rose.
 - B) Melea Moore: **REDACTED** **REDACTED** Ms. Moore is nurse employed by Centra and has information about Centra's custom of detaining patients without probable cause or other legal authority.
 - C) Timothy Trent, **REDACTED** **REDACTED** Mr Trent is the Administrator of the Blue Ridge Regional Jail Authority and was previously identified in the Plaintiff's First Supplemental Disclosure. In addition to the previously disclosed information, Mr. Trent also has information about Rose's incarceration and the injuries Rose sustained.

These disclosures are made based on information reasonably available to Plaintiff at this time. Plaintiff reserves the right to amend or supplement these disclosures as additional information becomes known.

DATE: 05 / 31 / 2017

/s/ M. Paul Valois

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PLAINTIFF'S SECOND SUPPLEMENTAL (RULE 26) DISCLOSURES